

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC; UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

EMERGENCY/EXPEDITED MOTION TO EXTEND TIME TO FILE REPLY OR MOTION TO REPLY TO OBJECTION TO THE MOTION TO AMEND THE COMPLAINT FILED BY THE DONAIS DEFENDANTS

1. I respectfully submit this request for an extension of time to file a reply or motion to reply to the Donais defendants' objection to the motion to amend the complaint, filed by Craig Donais, Mary Donais and Donais Law Offices ("the Donais defendants").
2. Grounds are as follows.
3. I filed a motion to amend the complaint on 10/27/23.
4. The Donais defendants filed an objection on 11/3/23.
5. If a reply is due in 7 days, it would fall on 11/10/23.
6. However, it is not clear to me whether under the rules, I have 7 days to file a reply or 14 days to file a reply. NB: I am confused regarding the rules for NH federal court. In one place it says I have 7 days to file a reply (or a motion for leave to file a reply). But then in another place, it says I have 14 days to file a reply when a magistrate judge is assigned.
7. In light of the above issues and confusion, I am requesting an extension of time of 14 days to file a reply or motion to file a reply.
8. This is a reasonable request under the circumstances.
9. Also, the court set a deadline yesterday (11/8/23) giving only two days' notice that a supplement to my objection to motion to dismiss is due tomorrow (11/9/23).
10. Because these **deadlines now fall on the same day**, I am not able to complete these deliverables at the same time and I thus need relief.
11. Furthermore, the Hilliard defendants have not yet responded to the motion to amend the complaint. They have 14 days from 10/27/23 to do so, which falls on tomorrow 11/10/23. I have reached out to the Hilliard

defendants to find out if they intend to file an objection. I have not yet received any response. It is likely that the Hilliard defendants will also file an objection. If/once they do, I will then have time to file an objection to that as well. Therefore, granting this motion will not affect any timelines in the case.

12. I also requested a hearing on this motion. I reiterate my request for hearing. It is only proper that a hearing be scheduled on this matter.
13. Please grant the relief requested.
14. I ask the court to issue an order on an expedited basis because a 7 day deadline, if applicable, would apply tomorrow.
15. Accordingly, I respectfully request that the Court allow this emergency/expedited motion.
16. I attempted in good faith to obtain concurrence from the defendants.

Respectfully submitted,

/s/ Andre Bisasor

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November 9, 2023

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served to the defendants in this case.

/s/ Andre Bisasor

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